

The City of Cleveland
Department of Public Safety
Division of Fire

Training Review

January 1, 2011 – June 30, 2012

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10/16/2012

Training Review

Executive Summary

This report summarizes the results of our review of the training records of the City of Cleveland's Department of Public Safety Division of Fire for the period January 1, 2011 through June 30, 2012.

Background

I am a consultant with Resources Global Professionals who was engaged by the City of Cleveland's Department of Public Safety in August 2012 to perform a review of training records for the Division of Fire ("Fire") for the above noted period. Our review included:

- Documenting and reviewing procedures and database tools used by Fire for tracking training hours.
- Documenting and reviewing procedures used by Fire for approval of overtime payments for off-shift training.
- Identifying, analyzing and assessing overtime payments for off-shift training hours for Fire's top 60 overtime earners (hereafter referred to as Group 1) during the period.
- Quantifying total training hours for Group 1 individuals and assessing compliance with Fire's General Orders as well as State of Ohio regulations.
- Determining validity of on-shift drill training hours recorded for a sample of 81 (approximately 10% of total) judgmentally-selected Fire employees (hereafter referred to as Group 2) from throughout the City by comparison to payroll/attendance records.

Our review included the examination of 3,788 overtime records from the KRONOS payroll system, 1,605 of which we manually identified as training as the data is not coded currently by KRONOS, 1,658 training overtime approval forms and 5,818 lines of drill data.

Key Observations and Recommendations:

Tracking of Training Hours

It is the responsibility of each Cleveland firefighter and paramedic to maintain active State licenses. Licenses are renewed by the State of Ohio every three years on an individual's birth date after he/she has certified that he/she has met minimum training requirements.

Per State regulation, the local Fire Chief is responsible for the City's training program. The Cleveland Fire Training Academy ("FTA") oversees the entire training program on the Chief's behalf. This entails providing a schedule of daily drills carried out at the various fire stations as well as coordinating in-house training courses provided by the FTA itself for fire and Cleveland EMS Headquarters for paramedic refreshers. On-line course curriculums for both fire and medical requirements have also been developed with training provider, University Hospital (UH). More specialized medical courses required of paramedics are approved by the FTA and must be taken off-shift at various local hospitals.

Training Review

Fire uses a series of disjointed databases to track training hours.

- Firehouse database – used to track drills and other in-house provided training.
- UH consolidated database – used to track on-line training and some additional outside courses; created and maintained by a captain in the FTA.
- EMS database – created by Cleveland EMS and used to record training information for paramedic classes they provide to both EMS and Fire personnel.

Our review disclosed very little overlap in information among the databases; however, we also noted that many outside training course hours are not being recorded in any of them, making the databases incomplete in their totality. Additionally, the Firehouse database in particular contained input errors (8% of drills examined) and almost 7% of its recorded drills could not be matched with a payroll attendance record. As a result, we used an 85% factor for drill data in our overall training hours analysis discussed below.

We summarized training hours from the above sources for the Group 1 sample, projected those hours over the 3-year re-certification period and compared those hours to State of Ohio requirements. Our results indicated that 39 of the 60 individuals in the sample would exceed State minimums by more than 300 hours which seems excessive; however, the appropriate number of training hours should be determined by Fire management. We also noted one individual was projected not to meet State minimums.

The fact that training information is spread out among all of these databases makes monitoring of an individual's training courses and hours and State certification status difficult and increases the risk that the individual is not properly trained. It also inhibits the City's ability to plan a comprehensive cost effective training program as total training hours are not being monitored on an overall basis.

We recommend that a single database be created to capture all training hours. Update access should be appropriately restricted and input controls should be utilized wherever possible to prevent the entry of bad data.

We recommend that Fire management perform its own review of training hours, determine the appropriate level of training for both fire and medical and develop a policy. The FTA should then begin monitoring total training hours both individually and collectively for compliance with the policy. The FTA should identify individuals deficient in training hours and develop corrective action plans to avoid re-certification issues.

Training Overtime

Two overtime request forms are used for approval of training overtime. The "City of Cleveland/Division of Fire/Request for Staff Overtime" is prepared for overtime related to fire and police/SWAT training and is used by FTA class instructors. The "EMT/Paramedic Con-Ed

Training Review

Overtime Request” form is used for all medical overtime. Both forms require specific approvals prior to the Chief’s final approval and both require attachment of supporting documentation as proof of class attendance. For 7% of overtime requests we examined, the document did not appear to be properly approved prior to entry of overtime hours by Division of Fire Payroll (“Payroll”) into KRONOS. Also, we noted only 12 instances (less than 1%) where course completion certificates were attached as evidence of attendance.

We recommend that Fire follow current policies that are in place and hold employees in positions of authority accountable for carrying them out. Supporting course completion certificates should be attached to the overtime request by the employee in all cases prior to submittal for approval; otherwise the overtime request should be returned to the employee.

General Order #8-1 EMT/EMT-P CERTIFICATION REQUIREMENTS limits paid training hours for functioning paramedics to 160 per calendar year. EMT/Paramedic Con-Ed Overtime Request forms are first submitted to the FTA who, among other things, logs the time in a simple Excel spreadsheet to ensure that the limit is not exceeded prior to approving the request and forwarding to the Chief. During our review we could not tie this spreadsheet to detail support provided by the FTA and our own analysis of hours indicates that some individuals have been overpaid, meaning that, as a control, this process is not effective.

We recommend that paid training overtime also be tracked using the single database recommended above. Reports should be developed that capture information by individual to facilitate monitoring by the FTA. Additionally, overtime hour codes should be set up in KRONOS to capture both regular, paid overtime and banked overtime training hours. Reports should then be developed to provide the FTA with those hours after each payroll is processed.

During our review, we noted many instances where individuals were paid the 4-hour minimum per occurrence, as defined in the Collective Bargaining Agreement, multiple times on a single day as multiple training classes were attended. For example, an individual taking two 2-hour courses on the same day was paid a total of 8 hours (2 times the minimum of 4) at time and one-half or the equivalent of 12 hours.

We do not believe that multiple application of the 4-hour minimum on a single day is standard practice nor is it in the spirit of the Collective Bargaining Agreement. We recommend that Fire define the term “occurrence” as it relates to training in a General Order, limiting its application to once per day. If this is not legally possible, then we recommend that this be considered in the next round of contract negotiations.

Please consult the Detail Observations and Recommendations section of this report for additional information on these issues as well as other observations that are considered less significant.

Shelly L. Trochemenko, CPA, CIA
Consultant

Training Review

Detail Observations and Recommendations

Table of Contents

<u>Observation:</u>	<u>Page #</u>
<u>1.</u> Overall Monitoring of Training Hours	5
2. Use of Multiple Databases to Track Training	6
3. Approval of Training Overtime	7
4. Tracking of Paid Overtime for Paramedics	9
5. Multiple Payments of Four (4) Minimum in a Single Day	11
6. Drill Attendance	12
7. Document Deficiencies	13
8. Other Items Noted Outside of the Scope for Follow Up	14

Training Review

Detail Observations and Recommendations

The detailed observations and recommendations below supplement our Executive Summary

1. Overall Monitoring of Training Hours

Observation: It is the responsibility of each Cleveland firefighter and paramedic to maintain active State licenses. Licenses are renewed by the State of Ohio every three years on an individual's birth date after he/she has certified that he/she has met the following minimum training requirements:

- Firefighter – 54 hours
- EMT – Basic (minimum requirement for all City firefighters) – 40 hours
- EMT – Paramedic – 86 hours

Fire monitors certifications to ensure that they are current. We reviewed certification status using the State's website for the Group 1 and Group 2 samples and noted that all were current. Fire also uses various databases as discussed below to record training hours taken, however, the databases are disjointed and there is no evidence that Fire monitors training hours on an overall basis.

As part of our overall analysis, we summarized training hours from various sources for the Group 1 sample, projected those hours over the 3-year re-certification period and compared those hours to State of Ohio requirements. Our results indicated that 39 of the 60 individuals in the sample would exceed State minimums by 300 hours or more for a 3-year period which seems excessive, however, the appropriate number of training hours should be determined by Fire management. We also noted one individual was projected not to meet State minimums.

Potential Issues: Failure to monitor training hours on an overall basis could inhibit the City's ability to plan a comprehensive cost effective training program, as our analysis would appear to indicate. Lack of overall monitoring also precludes the City from following up on an individual's training courses/hours and State certification status, which increases the risk that the individual is not adequately trained.

Recommendation: Management should perform its own review of training hours, determine the appropriate level of training for both fire and medical requirements and develop a policy. The FTA should then begin monitoring total training hours both individually and collectively for compliance with the policy. The FTA should identify individuals deficient in training hours and develop corrective action plans to avoid re-certification issues.

Training Review

Management Response

The Division is undertaking a comprehensive review of training practices, monitoring, recording and maintenance of training records. The goal is to insure compliance with all applicable State, Industry, and Audit standards in manner that is both operationally effective as well as cost effective. Properly implemented the practices outlined in this response will insure the Division of Fire addresses any deficiencies noted in this review.

The pending establishment of the Office of Integrity Control, Compliance and Employee Accountability will insure the effectiveness, consistency and the integrity of the changes outlined below.

2. Use of Multiple Databases to Track Training

Observation: Fire utilizes the following databases to track training hours.

- **Firehouse database**

This database is used to track drills and other in-house provided training. It is updated by many supervisory personnel at the various fire stations as well as the FTA. It does not appear to be monitored for accuracy as we noted that approximately 8% of drill lines we examined were in error (drill times recorded as negative amounts, with zero hours or in excessive amounts).

- **University Hospital (UH) consolidated database**

UH is a provider of on-line fire and medical requirement training. This database was created and is maintained by a captain in the FTA by merging UH fire and medical course data extractions which he has obtained from UH servers. During our review we noted that approximately 300 records for outside courses had also been manually added to the consolidated database by the EMT office of the FTA. This is well below the 2,600 outside courses we identified through our Group 1 testing.

- **EMS database**

This database was created by Cleveland EMS and is used to record training information for paramedic classes provided by EMS HQ for both EMS and Fire personnel. EMS personnel have stated that they update it from time to time with additional course information when completion certificates are provided by individuals. We could not tie an extract from this database to hard copy data in pdf format that we were given.

As a second test for completeness, we attempted to trace the recording of 15 training courses from the Group 1 sample into all of the above databases and were successful in only 2 instances. Given this and the above noted issues, it appears that the databases are inaccurate and incomplete individually and in their totality.

Potential Issues: Use of multiple databases to track the same type of data is inefficient as redundant resources are needed for their maintenance. It weakens control over data integrity as many individuals have access to update the databases. It also adds confusion as to where information should be recorded and it makes it difficult to monitor on an overall basis.

Training Review

Inaccurate or incomplete data may hinder good decision-making and the City's ability to respond appropriately to issues or inquiries. Data gathering across multiple sources slows down response time.

Recommendation: Best practice would be the creation of a single data base to capture all training hours for both Fire and EMS, including drills, in-house training, on-line courses and courses through third party providers. Ability to update the databases should be restricted to certain members of the FTA with perhaps the exception of drill attendance only. If drills continue to be entered at individual fire stations, then input controls should be established to prevent the entry of bad data. For example, drill numbers/names with pre-populated times could be provided in the form of a drop down box.

Management Response

The Division of Fire acknowledges that maintaining multiple databases creates a challenge in reviewing and monitoring training activity. Initiatives have already been started within the division to consolidate our training records in a Training Records Office at one location, the Fire Training Academy. Although technological and training challenges remain, the following steps have been identified to move forward.

Establishment of a Training Records Office within the Fire Training Academy that will be charged with the following:

- Collecting all training records (on-line, FTA, Off-site, routine Fire Station) and maintaining the records in a retrievable and systematic method. This will create a centralized location to; maintain, record, monitor and retrieve all training records for easy review.
- Insuring all appropriate documentation is received prior to entry into the training record system.
- Insuring all appropriate authorization and validations are received prior to any requests for compensation are forwarded for approval.
- Conducting routine and random audits of Firehouse Drill entries to insure entry validity and compliance.

Challenges: The designated Public Safety Reporting Management System (RMS) remains undetermined (i.e. Firehouse vs. New World) and the Division will require additional IT training for personnel.

3. Approval of Training Overtime

Observation: Two overtime request forms are used for approval of training overtime. The "City of Cleveland/Division of Fire/Request for Staff Overtime" is prepared for overtime related to fire and police/SWAT training. It is also used by FTA class instructors for approval of instruction

Training Review

time. The form requires written approval by an immediate supervisor followed by the Chief or Acting Chief. The "EMT/Paramedic Con-Ed Overtime Request" form is used for all overtime for medical continuing education and is to be approved by the FTA (after confirming class attendance and eligibility for overtime) followed by the Chief or Acting Chief. Both forms require the attachment of supporting documentation. The "EMT/Paramedic Con-Ed Overtime Request" specifically states that "Applicable Completion Cert(s) Must be Attached – No Exceptions".

Documents are forwarded to Payroll after approval by the Chief or Acting Chief. If the training and the Chief's approval occur in the current pay period, Payroll enters the overtime into the KRONOS payroll system on the date of the training. If the Chief's approval occurs after the close of the pay period in which the training took place, Payroll judgmentally selects an entry date in the current pay period as items cannot be posted to a closed period in KRONOS. This practice makes it impossible to conclude whether the overtime was actually entered into the system after the Chief's approval.

During our review of the Group 1 sample, we noted 110 instances (or approximately 7% of overtime requests examined) where the overtime request did not appear to be properly approved prior to entry into KRONOS by Payroll:

- 47 Supervisor did not approve.
- 45 Chief's approvals appeared to be later than the KRONOS entry date.
- 14 Supervisors approved after the Chief.
- 3 Chief did not approve.
- 1 No approvals.

We also noted only 12 instances out of the 1,658 overtime forms we examined (less than 1%) where supporting documentation (course completion certificates) was attached.

Potential Issues: Overtime forms are not completed in accordance with Division of Fire policy. More importantly, unauthorized payments can occur if the approval process is circumvented.

Improper payments of overtime for training courses not completed can be made if evidence of course completion (certificates provided at class end, not sign-in sheets) is not attached to the overtime approval request. Additionally, appropriate approval cannot take place if supporting documentation is not available for review before signature.

Recommendation: Fire should follow current policies that are in place and hold employees in positions of authority accountable for carrying them out. Supporting course completion certificates should be attached to the overtime request by the employee in all cases prior to submittal for approval; otherwise the overtime request should be returned to the employee.

Payroll should not process overtime requests without all proper signatures. For training overtime incurred and approved after the applicable pay period is closed, Payroll should enter the overtime into KRONOS on the date of the Chief's approval and append the entry with a note indicating the actual date that the training took place.

Training Review

Management Response

The Division acknowledges the lack of compliance to the current policy, General Order # 8-1 in regard to the attachment of documentation. The day-to-day practice was amended to insure the documentation was received at the EMT Office where it was reviewed, filed and then signed and forwarded for approval at the Chief's office. This practice conflicted with the stated policy in GO 8-1. The audit further noted that the documentation provided by the EMT Office did not sufficiently support the approved overtime with "certificates of completion" although it does acknowledge that sign-in sheets were provided. The following actions are being undertaken to address the issue:

1. Establishment of the Training Records Office as outlined in #2 above.
2. General Order 8-1 is currently being revised and will insure the following:
 - a. Certificate of completion shall be attached to the request form and forwarded. Failure to have the certificate or an acceptable alternative shall be cause for the request to be denied. The attached certificate can then be retained in payroll file records.
 - b. A central database for tracking of training hours shall be maintained
3. The Staff Overtime Request form is being revised to a single overtime request form as recommended.
4. The Division will work with payroll to amend the entry process for request for payment received after the closing of payroll.

4. Tracking of Paid Overtime for Paramedics

Observation: General Order #8-1 EMT/EMT-P CERTIFICATION REQUIREMENTS limits functioning paramedics to a maximum of 160 hours of paid training for approved courses per year in addition to refresher courses. Non-functioning paramedics may receive banked time only for this training.

As previously noted under #3 above, the FTA must approve all "EMT/Paramedic Con-Ed Overtime Request" forms prior to submittal to the Chief. A lieutenant in the FTA is the central collection point for these forms. Once received, the lieutenant ensures that either a course completion certificate accompanies the form or that a course sign-in sheet with the requestor's signature has been forwarded to the FTA by the provider.

The lieutenant then determines if the overtime is eligible for payment by entering the overtime hours (usually the 4-hour minimum per the Collective Bargaining Agreement as most training courses are less than 4 hours) into an Excel spreadsheet (referred to as the Medic database) the

Training Review

lieutenant maintains for functioning paramedics. The Medic database accumulates annual totals by individual but contains no course descriptions or dates. Banked hours are not included in the calculation. If the 160 hour annual limit is not reached, the lieutenant processes the overtime request. If it is, the overtime request is denied.

To test the accuracy of the Medic databases, we requested supporting detail for 2011 and 2012 entries for a sample of 5 functioning paramedics. We could not reconcile detail provided by the FTA, mostly in the form of course sign-in sheets rather than completion certificates, to the Medic database.

As part of our review of Group 1 overtime, we accumulated paid and banked training overtime hours for the 18 month review period and compared the total to the limit per the General Order. We noted:

- Paid + banked overtime hours for 3 functioning paramedics had already exceeded the limit of 320 hours (160 hours for 2 years) – Impact to the City of approximately \$9,000.
- 1 non-functioning paramedic received a small amount of overtime pay (<\$1,000).
- 6 non-paramedics received overtime or compensatory time for training totaling approximately \$7,000.

Potential Issues: Failure to track paid training overtime hours properly can result in payments to individuals that are not in compliance with General Order #8-1. Additionally, undetected duplicate payments can be processed. Exclusion of banked hours in the limit calculation could allow individuals to accumulate time in excess of the limit and receive payment at a later date.

Recommendation: Paid training overtime should be tracked using the single database recommended previously in #2 above. Reports should be developed that capture information for both paid and banked hours by individual to facilitate monitoring by the FTA. Overtime hour codes should be set up in KRONOS to capture both regular, paid overtime and banked overtime training hours. Reports should then be developed to provide the FTA with those hours after each payroll is processed.

Management Response

The Division is working to implement an information flow process that will allow the training information to be captured and maintained at the Training Records Office as outlined in Item # 2 above. This will provide one location and system for all training records.

The Division will work with the Payroll Unit to identify reporting options to assist in Quality Assurance of all training records. The Training Academy will be utilized for appropriate review, monitoring and retrieval.

Training Review

Additionally as the Divisions of Fire and EMS move toward integration the goal to conduct all paramedic training “in-house” will provide a more effective and consistent method for training and record keeping.

The Division is seeking specific detail information from the external auditor to review any underpayments or overpayments and will make adjustments to insure appropriate compensation.

5. Multiple Payments of the 4-Hour Minimum on a Single Day

Observation: Article VIII, Section D of the current Collective Bargaining Agreement provides that non-holdover overtime be paid “in any event not less than four (4) hours at time and one-half for each occurrence”. Fire applies this provision of the contract to training overtime multiple times if more than one course is taken on a given day. For example, an individual taking two 2-hour courses on the same day would be paid a total of 8 hours (2 times the minimum of 4) at time and one-half or the equivalent of 12 hours.

During our review of Group 1 overtime, we noted: that 26 of the 60 employees in the Group 1 sample received multiple payments of the 4-hour minimum at least once during the 18 month period for multiple training classes attended on a single day. In most cases, the 4-hour minimum was paid twice; however, we did note 4 instances where the 4-hour minimum was paid 3 times. Ten of the 26 individuals received multiple 4-hour minimums 5 or more times with the highest being 11 times during the review period.

Potential Issues: In-classroom hours related to these payments was calculated by us as 434. This equates to 1,282 paid overtimes hours (at time and one-half). Total impact to the City was calculated to be approximately \$13,000.

Recommendation: We do not believe that multiple application of the 4-hour minimum on a single day is standard practice nor is it in the spirit of the Collective Bargaining Agreement. We recommend that Fire define the term “occurrence” as it relates to training in a General Order, limiting its application to once per day. If this is not legally possible, then we recommend that this be considered in the next round of contract negotiations.

Management Response

The Division acknowledges that there have been multiple occurrences of “4-hour” minimum’s in single days and these were not prohibited in the current General Order. Both the current policy and proper authorization should account for appropriate separation between occurrences (i.e. if the two “occurrences” fall within the same 4 hour period it should be one “occurrence”). The specific data will be reviewed to determine if evidence indicates otherwise.

Additionally General Order #8-1 is currently under revision and will limit any paid training occurrence to one per day. As part of the ongoing integration of the Divisions of Fire and EMS

Training Review

we are moving toward providing all paramedic training ‘in-house’ preventing such occurrences as we move forward.

Training Review

6. Drill Attendance

Observation: For the review period, we compared daily drill entries in the Firehouse database for the Group 2 sample to KRONOS payroll records to determine if individuals were present at the station on the days of the drills. In 390 instances (approximately 7% of total drills reviewed) there was no match with KRONOS on a given day, indicating that the firefighter received drill credit but was not present at the time. Of the 81 in the sample, 10 individuals appeared to be absent when the drill took place 10 times during the review period with 2 individuals at a high of 20 absences.

While these situations appear to be the result of the officer in charge incorrectly giving the firefighter drill credit, they could also be due to data input errors by the officer in charge or the dating of activity entered into KRONOS by Payroll.

Potential Issues: Firefighters may not be receiving the training the City believes it is providing which can lead to more risk at fire scenes when firefighters are presented with situations for which they are not prepared. This also increases the City's legal risk.

Recommendation: We recommend that each firefighter be required to sign-in at the beginning of each drill, that the sign-in sheets be retained by each station and that they be available for periodic audit, including comparison to entry in the Firehouse database, by the City. See our recommendation under #1 above regarding input controls to improve data accuracy going forward.

Management Response

The auditors identified that in approximately 7% of the sample selected the "drill" hours did not reconcile with the attendance records. The auditors recommended the following.

- The Division of Fire should establish a 'sign in' sheet at each fire station for an employee to sign upon completion of the training drill.

The Training Records Office, as outlined in response No. 2 above, will be charged with overseeing the recording and auditing of the Company Drill Program. The recommendation by the external auditor of an additional 'sign-in' sheet for personnel already "signed-in" on duty creates additional challenges. The current "firehouse" database system should provide a near term process to continue to submit daily drills. The establishment of the audit process both within the Training Records Office and Office of Integrity Control, Compliance and Employee Accountability should provide sufficient quality assurance to insure validity.

Next Steps include a determination of the RMS system to be implemented by the Department of Public Safety; establishment of an acceptable standard error rate for associated data entry; review of specific data identified by the external auditor to determine if any additional review should be conducted of the high error rates associated with specific individuals.